

HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

ARKON RESOURCES, INC.,

Defendant.

CONSOLIDATED CASE

Lead Case No. 2:15-cv-01984-JLR

**STIPULATED MOTION AND ~~PROPOSED~~
ORDER FOR REVISED DISCOVERY
SCHEDULE**

NOTE ON MOTION CALENDAR:
March 1, 2018

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

HIGH GEAR SPECIALTIES INC.,

Defendant.

Case No. 2:15-cv-01985-JLR

JURY TRIAL DEMANDED

NATIONAL PRODUCTS INC.,

Plaintiff,

v.

WIRELESS ACCESSORY SOLUTIONS,
LLC, d/b/a IBOLT – WIRELESS
ACCESSORY SOLUTIONS, LLC,

Defendant.

Case No. 2:15-cv-02024-JLR

JURY TRIAL DEMANDED

STIP. MTN. FOR REVISED
DISCOVERY SCHEDULE

Case Nos. 2:15-cv-01984-JLR,
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
2:16-cv-00109-JLR

1 NATIONAL PRODUCTS INC.,

2 Plaintiff,

3 v.

4 BRACKETRON, INC.

5 Defendant.

Case No. 2:16-cv-00109-JLR

JURY TRIAL DEMANDED

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7 Pursuant to the Court's October 23, 2017 Order for Revised Schedule (Dkt. No. 105),

8 plaintiff National Products Inc. ("NPI") and defendants Arkon Resources, Inc. ("Arkon"), High

9 Gear Specialties Inc. ("High Gear"), Wireless Accessory Solutions, LLC, d/b/a IBOLT –

10 Wireless Accessory Solutions, LLC ("IBOLT"), and Bracketron, Inc. ("Bracketron")

11 (collectively, "Defendants") jointly submit the following revised proposed schedule to govern

12 the above-captioned matters.

13 The parties ask that the Court enter the following schedule of deadlines:

14 Event	15 Current Schedule (Dkt. No. 105)	Parties' Proposal
16 Noting date for all motions related to 17 discovery, pursuant to LCR 7(d)(3) or LCR 18 37(a)(2)	March 29, 2018	May 11, 2018
19 Discovery Completion	April 6, 2018	May 18, 2018

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21 Good cause exists to modify the current schedule. Under the current schedule, the

22 deadline to complete depositions and all other remaining discovery is in just over five weeks, on

23 April 6, 2018. Coordination of counsel and witness schedules, particularly for the multiple

24 expert witness depositions, has been made extremely difficult by trial and other extended

25 obligations of counsel. Accordingly, due to the condensed schedule and the parties' scheduling

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1 conflicts in the upcoming weeks, the parties believe that good cause exists to modify the current
2 schedule as provided above.

3 Dated: March 1, 2018

Respectfully submitted,

6 By: s/Jessica M. Kaempf

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Ewa M. Davison, WSBA No. 39524
Jonathan T. McMichael, WSBA No. 49895
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13 Attorney for Plaintiff
14 National Products Inc.

27 STIP. MTN. FOR REVISED
28 DISCOVERY SCHEDULE
Case Nos. 2:15-cv-01984-JLR,
2:15-cv-01985-JLR, 2:15-cv-02024-JLR,
2:16-cv-00109-JLR

1 Dated: March 1, 2018

Respectfully submitted,

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17 *Attorneys for Defendants Arkon Resources,*
18 *Inc.; Wireless Accessory Solutions, LLC, d/b/a*
19 *iBolt – Wireless Accessory Solutions, LLC; and*
20 *High Gear Specialties, Inc.*

21 Dated: March 1, 2018

Respectfully submitted,

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Attorneys for Defendant
Bracketron, Inc.

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ORDER

This matter is before the Court on the parties' Stipulated Motion for Revised Schedule. The Court, having considered this matter and the record in this case, ORDERS as follows:

The Stipulated Motion is GRANTED in its entirety.

IT IS HEREBY ORDERED THAT the following schedule of deadlines is in effect:

Event	Deadline
Noting date for all motions related to discovery, pursuant to LCR 7(d)(3) or LCR 37(a)(2)	May 11, 2018
Discovery Completion	May 18, 2018

SO ORDERED this 1st day of March, 2018.


HONORABLE JAMES L. ROBART
UNITED STATES DISTRICT JUDGE

1 Presented by:

2 By: s/Jessica M. Kaempf

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4 Ewa M. Davison, WSBA No. 39524
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26 *Attorneys for Defendant Arkon Resources, Inc.*
27 *Attorneys for Defendants Arkon Resources, Inc.;*
28 *Wireless Accessory Solutions, LLC, d/b/a iBolt –*
Wireless Accessory Solutions, LLC; and
High Gear Specialties Inc.

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28 *Attorneys for Defendant*
Bracketron, Inc.

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CERTIFICATE OF SERVICE

I, Kathy Meyer, hereby certify that on March 1, 2018, I caused the foregoing
STIPULATED MOTION AND [PROPOSED] ORDER FOR REVISED DISCOVERY
SCHEDULE to be served on the following parties as indicated below:

James E. Breitenbucher (WSBA No. 27670) FOX ROTHSCHILD LLP 1001 Fourth Avenue, Suite 4500 Seattle, WA 98154-1065 <i>Attorneys for Defendants Arkon Resources, Inc.;</i> <i>Attorneys For Defendant Wireless Accessory</i> <i>Solutions, LLC, d/b/a iBolt – Wireless Accessory</i> <i>Solutions, LLC</i> <i>Attorneys for Defendant</i> <i>High Gear Specialties Inc.</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email jbreitenbucher@foxrothschild.com
Marc A. Karish (admitted <i>pro hac vice</i>) KARISH & BJORGUM, PC 119 E. Union Street, Suite B Pasadena, CA 91103 <i>Attorneys for Defendants Arkon Resources, Inc.;</i> <i>Attorneys For Defendant Wireless Accessory</i> <i>Solutions, LLC, d/b/a iBolt – Wireless Accessory</i> <i>Solutions, LLC</i> <i>Attorneys for Defendant</i> <i>High Gear Specialties Inc.</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email marc.karish@kb-ip.com
Robert J. Carlson (WSBA No. 18455) LEE & HAYES PLLC One Convention Place 701 Pike Street, Ste. 1600 Seattle, WA 98101 <i>Attorneys for Defendant Bracketron, Inc.</i>	<input type="checkbox"/> By United States Mail <input type="checkbox"/> By Legal Messenger <input checked="" type="checkbox"/> By Electronic CM/ECF <input type="checkbox"/> By Overnight Express Mail <input type="checkbox"/> By Facsimile <input type="checkbox"/> By Email [by agreement of counsel] bob@leehayes.com

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1 2 Terrance C. Newby (admitted <i>pro hac vice</i>) 3 E. Casey Beckett (admitted <i>pro hac vice</i>) 4 MASLON LLP Wells Fargo Center 90 South Seventh St., Ste. 3300 Minneapolis, MN 55402 Attorneys for Defendant Bracketron, Inc.	[] By United States Mail [] By Legal Messenger [X] By Electronic CM/ECF [] By Overnight Express Mail [] By Facsimile [] By Email [by, agreement of counsel] terry.newby@maslon.com casey.beckett@maslon.com
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8 Dated: March 1, 2018

By: s/Kathy Meyer
 For Jessica M. Kaempf, WSBA No. 51666
 FENWICK & WEST LLP

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